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Attorney for Defendant
LORENZO LEE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

10 UNITED STATES OF AMERICA,) No. CR 19-0226 RS
11 Plaintiff,)
12 v.) STIPULATION REGARDING FILING DATES,
13 LORENZO LEE,) CONTINUING HEARING DATE AND
14 JESSE LOPEZ, III,) ORDER CONTINUING HEARING AND TO
15 EVAN MARTINEZ DIAZ,) EXCLUDE TIME UNDER THE SPEEDY
16 TIMOTHY PEOPLES,) TRIAL ACT
Defendants.)

The parties last appeared before the Court on October 19, 2021 for a status conference where a briefing schedule and hearing was set for wiretap motions. The government and Mr. Lee are discussing possible resolution of the case and need additional time for discussions. To facilitate these discussions and to preserve the expenditure of unnecessary CJA funds while they take place and for the continued review of discovery by the defense, the parties stipulate to the following motion schedule:

Motions to Suppress Wiretaps – Defense

The parties further stipulate to continue the motion hearing currently scheduled on March 22, 2022 until May 5, 2022 at 9:30 a.m. and further agree that the time from March 22, 2022 through May 5, 2022 should be excluded under the Speedy Trial Act because failure to grant the requested continuance

1 would deny defense counsel the reasonable time necessary for effective preparation, taking into account
2 the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The ends of justice served by granting
3 the requested continuance outweigh the best interests of the public and the defendant in a speedy trial
4 and in the prompt disposition of criminal cases. *See id.* § 3161(h)(7)(A).

5 IT IS SO STIPULATED.

6 DATED: January 10, 2022

Respectfully submitted,

7 STEPHANIE M. HINDS
8 United States Attorney

9 _____
10 /s/
11 DANIEL PASTOR
12 Assistant United States Attorney

13 DATED: January 10, 2022

14 _____
15 /s/
16 GAIL SHIFMAN
17 Counsel for Defendant Lorenzo Lee

18 DATED: January 10, 2022

19 _____
20 /s/
21 ERICK L. GUZMAN
22 Counsel for Defendant Jesse Lopez, III

23 DATED: January 10, 2022

24 _____
25 /s/
26 ARTURO HERNANDEZ
27 Counsel for Defendant Timothy Peoples

28 DATED: January 10, 2022

29 _____
30 /s/
31 KATHY LYNN TROSCLAIR
32 Counsel for Defendant Timothy Peoples

ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown,

The Court adopts the following motion schedule:

Motions to Suppress Wiretaps – Defense

February 15, 2022

March 22, 2022

April 5, 2022.

Further, the motion hearing set for March 22, 2022 is continued to April 26, 2022 at 9:30 a.m.

And the Court finds that exclusion from the time limits applicable under 18 U.S.C. § 3161 (the Speedy Trial Act) for the period from March 22, 2022 through April 26, 2022, is warranted because to grant the requested exclusion would unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. (h)(7)(B)(iv). The Court further finds that the ends of justice served by granting the requested exclusion outweigh the best interests of the public and the defendants in a speedy trial and in the prompt disposition of criminal cases. 18 U.S.C. § 3161(h)(7)(A).

IT IS SO ORDERED.

DATED: January 10, 2022


HON. RICHARD SEEBOOM
Chief United States District Judge